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601 California Street

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Attorneys for Individual and Representative

Plaintiff Shary Everett

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHARY EVERETT, on behalf of herself and all others similarly situated,

Plaintiff.

v.

MCI, INC., a Delaware Corporation,

Defendant.

In re:

WORLDCOM, INC., et al.,

Debtors.

Adversary Proceeding

No. 07-01792-AJG

Case No. 07-9590 (DC)

Chapter 11

Case No. 02-13533-AJG

(Jointly Administered)

NOTICE OF MOTION AND MOTION FOR OR ADMISSION TO PRACTICE PRO HAC VICE OF A. J. De BARTOLOMEO

PLEASE TAKE NOTICE that, upon the accompanying Affidavits of Jonathon K. Levine and A. J. De Bartolomeo, dated February 8, 2008, and the exhibits annexed thereto, and upon all prior papers and proceedings, Plaintiff will move this Court on a date to be determined, upon submissions, unless otherwise ordered by the Court, for an Order permitting A. J. De Bartolomeo of Girard Gibbs LLP, counsel for Plaintiff, to practice before this Court in connection with all proceedings in this matter.

Dated: February 11, 2008

JONATHAN K. LEVINE

Mark D. Silverschotz (MDS-8393)

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Attorneys for Individual and Representative Plaintiff Shary Everett

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHARY EVERETT, on behalf of herself and all others similarly situated,

Plaintiff,

٧.

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Defendant.

WORLDCOM, INC., et al.,

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No. 07-01792-AJG

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Chapter 11

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(Jointly Administered)

AFFIDAVIT OF JONATHAN K. LEVINE IN SUPPORT OF PLAINTIFFS' PRO HAC **VICE ADMISSION OF A. J. De BARTOLOMEO**

I, Jonathan K. Levine, being duly sworn, deposes and says that the following facts are true and correct to the best of my personal knowledge:

- 1. I am an attorney duly admitted to practice law before this Court. My admission to this Court was on March 14, 1989.
 - 2. I am not under suspension or disbarment by any court.
- 3. I am a partner at the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14th Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.
- 4. I make this affidavit in support of Plaintiffs' Motion for the admission of Aaron M. Sheanin *pro hac vice*.
- 5. I have known A. J. De Bartolomeo for 7 years, and believe she will uphold the integrity of this Court, and will comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the law of the United States of America that the foregoing is true and correct. Executed this 11th day of February, 2008 at San Francisco, California.

San Francisco, California

Jonathan K. Levine

Subscribed and Sworn to me this 11th day of February, 2008.

Commission # 1778842
Notary Public - California
San Francisco County
My Comm. Biplies Nov8, 2011

WITNESS my hand and official seal.

STACY CHENC

Mark D. Silverschotz (MDS-8393)

REED SMITH LLP

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New York, NY, 10022

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Daniel C. Girard

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Attorneys for Individual and Representative Plaintiff Shary Everett

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHARY EVERETT, on behalf of herself and all others similarly situated,

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Chapter 11

Case No. 02-13533-AJG

(Jointly Administered)

AFFIDAVIT OF A. J. De BARTOLOMEO IN SUPPORT OF PLAINTIFFS' PRO HAC **VICE ADMISSION**

- I, A. J. De Bartolomeo, being duly sworn, deposes and says that the following facts are true and correct to the best of my personal knowledge:
- 1. I am an attorney duly admitted to practice law in the State of California. Attached hereto as Exhibit A, is an original Certificate of Good Standing from the State Bar of California.
 - 2. I am not under suspension or disbarment by any court.
- 3. I am a partner at the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14th Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.
- 4. I make this affidavit in support of Plaintiffs' Motion for my Admission pro hac vice.
- 5. I recognize that if I am admitted *pro hac vice*, I am within the disciplinary jurisdiction of the United Stated District Court for the Southern District of New York. Upon my admission pro hac vice, I agree to comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the law of the United States of America that the foregoing is true and correct. Executed this 11th day of February, 2008 at San Francisco, California.

J. De Bartolomeo

GIRARD GIBBS LLP

601 California Street, 14th Floor San Francisco, California 94108

Telephone: (415) 981-4800 Facsimile: (415) 981-4846

On February 11, 2008, before me, Stacy Cheng, Notary Public, personally appeared A. J. De Bartolomeo, proved by satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity on behalf of which the person acted, executed the instrument.

STACY CHENG
Commission # 1778842
Notary Public - California
San Francisco County
MyComm. Biplies Nov 8, 2011

WITNESS my hand and office seal.

EXHIBIT A



180 HOWARD STREET SAN FRANCISCO, CALIFORNIA 94105-1639 TELEPHONE (415) 538-2000

January 23, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ANNE MARIE JANINE DE BARTOLOMEO, #136502 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1988; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

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Custodian of Membership Records